

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344

DECLARATION OF LISA M. FRIEL

I, Lisa M. Friel, state as follows under penalty of perjury:

1. I am a Senior Vice President and Special Counsel for Investigations with the National Football League (“NFL”). I have served in that position since 2015.

2. I worked at the Manhattan District Attorney's Office from 1983 to 2011. While in the Office, I focused on and became a specialist in sexual assault investigation and prosecution. In 1991, I was named a Deputy of the Office’s Sex Crimes Prosecution Unit, and in 2002, I was named the Chief of the Unit. I remained Chief of the Unit until I left the Office in 2011. After leaving the Manhattan District Attorney’s Office and before joining the NFL, I worked for T&M Protection Resources as Vice President in charge of the Sexual Misconduct Consulting & Investigation division.

3. I am personally familiar with the facts set forth in this declaration and would be able to testify to them at any remote evidentiary hearing in this matter.

4. [REDACTED] contacted [REDACTED]

[REDACTED]

[REDACTED] That day, I spoke to a number of [REDACTED]
[REDACTED] on the telephone, including [REDACTED]

5. [REDACTED] Mr. Rawson sent me an email [REDACTED]
He copied on this email Norman Chirite, [REDACTED]

[REDACTED]
[REDACTED] A true and correct copy of that correspondence is
attached here as Exhibit 1.

6. Later that day, I had a phone conversation with both men and followed up that
phone call with an email [REDACTED] In that email
I wrote that [REDACTED]

[REDACTED]
[REDACTED] I explained that [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] I provided [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] A true and correct
copy of that correspondence is attached here as Exhibit 2.

7. [REDACTED] In particular, [REDACTED]
[REDACTED] to conduct an independent investigation [REDACTED]
[REDACTED] report on that
investigation [REDACTED]
[REDACTED] findings of the independent counsel.

8. [REDACTED], I had a telephone conversation with [REDACTED]. [REDACTED] informed me that [REDACTED] spoken to Beth Wilkinson who had told him that, [REDACTED]. During that conversation, [REDACTED] said to me, [REDACTED]. Later that day, I spoke to Ms. Wilkinson about the scope of the investigation and related to her what [REDACTED]. Thereafter, [REDACTED] wrote to me that [REDACTED]. [REDACTED]. That communication also appears on the attached Exhibit 2.

9. [REDACTED] from the investigation [REDACTED] events or allegations from the investigation. [REDACTED] from the investigation; [REDACTED] allegations from the investigation. The scope of the investigation, [REDACTED]. [REDACTED]. [REDACTED].

10. On several occasions following [REDACTED] the League issued statements confirming (i) that Wilkinson Walsh would have full authority and the Team's cooperation to engage in a thorough investigation of all allegations of workplace misconduct that had been or would be brought forth in the investigation, and (ii) that the League would ensure that the Team and its employees satisfied their obligation to give full cooperation to Wilkinson Walsh. The Team also publicly pledged that it was "committed to investigating [the allegations] fully and stated that it had "encouraged any employees who have endured similar experiences, now or in the past, to report it immediately." The Team's owner, Mr. Snyder, also issued similar public statements,

for example, on July 18, stating, “Beth Wilkinson and her firm are empowered to do a full, unbiased investigation and make any and all requisite recommendations.”

11. [REDACTED] wrote a letter [REDACTED]

[REDACTED]

[REDACTED] A copy of that letter is attached here as Exhibit 3. In the letter, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. In that letter [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Mr. Snyder released a statement [REDACTED] attached as Exhibit 4. Mr. Snyder stated that he had “suggested that the NFL assume full oversight of the investigation so that the results are thorough, complete and trusted by the fans, the players, our employees and the public.” Mr. Snyder also confirmed that “the entire Washington Football Team remains committed to fully cooperating with all aspects of the investigation.”

13. [REDACTED] the NFL formally retained Wilkinson Walsh to continue

its independent investigation into workplace and sexual misconduct at the Team. [REDACTED]

[REDACTED] NFL directed Wilkinson Walsh to continue its investigation into allegations [REDACTED]

14. [REDACTED]

[REDACTED]

15. By [REDACTED]

[REDACTED] had engaged in workplace misconduct directed at the former employee. [REDACTED] Ms. Wilkinson and her colleague Moira Penza reported to the NFL that they had interviewed [REDACTED]

[REDACTED]

16. [REDACTED] investigation into allegations of sexual and workplace misconduct at [REDACTED] is ongoing. Wilkinson Walsh (now Wilkinson Stekloff) has not yet reported any findings or conclusions [REDACTED] Nor has [REDACTED] reached any conclusions about any aspect of the allegations that are the subject of the investigation. In addition, no

decision had been made about whether any of Wilkinson Stekloff's findings and recommendations will be disclosed to the public. [REDACTED]

[REDACTED]

I declare under the penalty of perjury that the foregoing is true and correct.

November 20, 2020.

[REDACTED]

Lisa M. Friel

EXHIBIT W19

Friel, Lisa

From: Will Rawson [REDACTED]
Sent: Saturday, July 11, 2020 11:32 AM
To: Friel, Lisa
Cc: 'Norman Chirite'
Subject: Update -- privileged & confidential
Attachments: Sim.zip

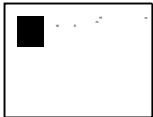
Hi Lisa. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Best,
Will



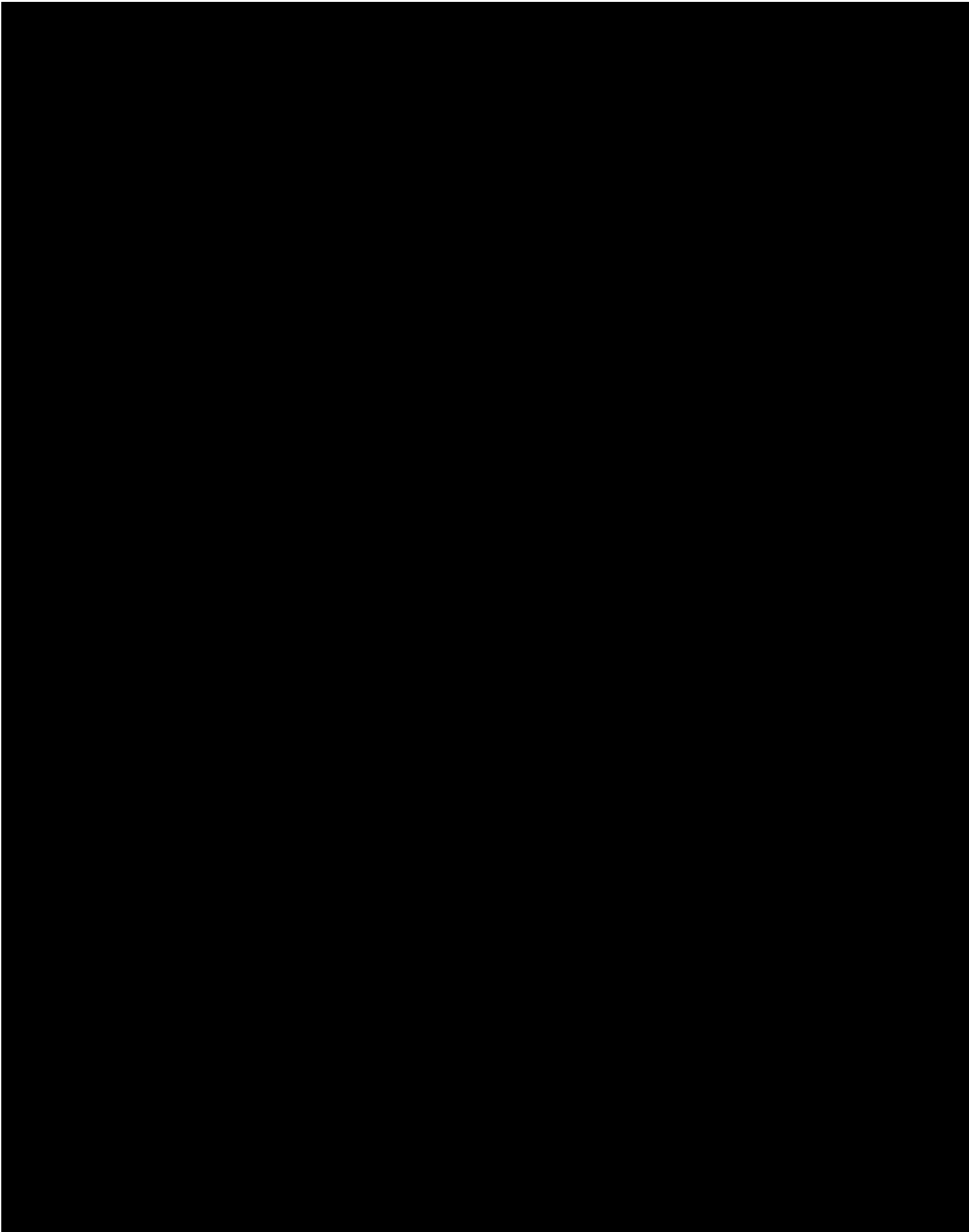
Will Rawson

General Counsel | **THE WASHINGTON REDSKINS**
21300 Redskin Park Dr, Ashburn, VA 20147

[REDACTED]

.....

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]



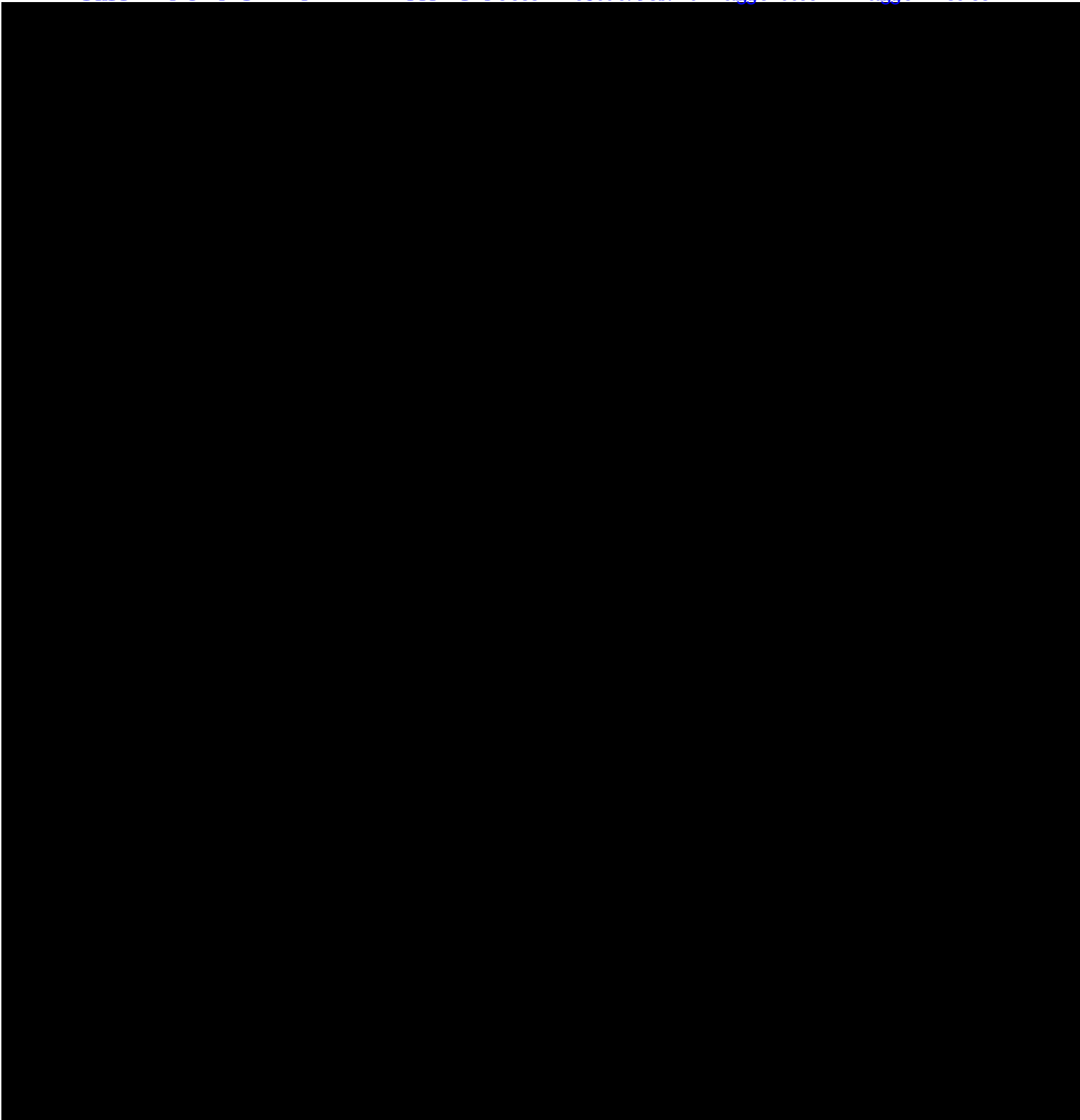


EXHIBIT W20

Subject: Fwd: Employment Investigation

Date: 7/13/2020 10:35 AM

From: "Norman Chirite"

To: "Beth Wilkinson"

----- Forwarded message -----

From: **Norman Chirite**

Date: Mon, Jul 13, 2020 at 10:34 AM

Subject: Re: Employment Investigation

To: Friel, Lisa

Cc: Will Rawson

Hi Lisa,

- Norm

On Mon, Jul 13, 2020 at 10:31 AM Friel, Lisa wrote:

Good morning Will and Norm,

Lisa

Lisa M. Friel

Special Counsel for Investigations

National Football League

345 Park Avenue

New York, NY 10154

Tel: 212-450-2000

Direct tel:

Fax:

Email: [REDACTED]



From: Friel, Lisa [REDACTED]

Sent: Saturday, July 11, 2020 6:48 PM

To: Will Rawson [REDACTED]; Norman Chirite [REDACTED]

Subject: Employment Investigation

Will and Norm,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lisa

Lisa M. Friel

Senior Vice President

Special Counsel for Investigations

Sent from my iPhone

EXHIBIT W21

EXHIBIT W22

Recently, The Washington Football Team launched an independent third-party investigation into allegations about our culture and incidents of harassment. In conversations with Commissioner Goodell, Tanya and I suggested that the NFL assume full oversight of the investigation so that the results are thorough, complete and trusted by the fans, the players, our employees and the public. I appreciate Commissioner Goodell agreeing to our suggestion and the entire Washington Football Team remains committed to fully cooperating with all aspects of the investigation.

#

EXHIBIT W23

